REMARKS

Reconsideration of the present application, as amended, is respectfully requested. Claims 1, 33, 38 and 44 have been amended. Claims 51-54 are new. No new matter has been added.

The Examiner rejected claims 1-8, 10-15, 18-23, 25, 27-29, 33-40, 42-46, and 48-50 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Number 6,182,127 of Cronin III, et al. ("Cronin"). The Examiner rejected claims 9, 16, 24, 26 and 30-32 under 35 U.S.C. §103(a) based on Cronin in view of U.S. Patent Number 5,973,692 of Knowlton et al.

As stated in the present Office Action, the Examiner finds Applicant's previous arguments to be unpersuasive and contends that Cronin does in fact teach multiple independent images having separate and independent data files. Office Action, p. 8. Therefore, since the Examiner finds that the previously-added limitations do not make the claims patentable, Applicant has deleted those limitations from the independent claims in this amendment.

Note, however, that Applicant has added four new dependent claims (51-54) that recite that the multiple images are <u>not all elements of the same image</u>. Applicant believes that this limitation clearly distinguishes from Cronin, in which the concurrently-displayed "tiles" are always elements of a single, larger image. However, this distinction

is also believed to be moot in view of the amendments to the independent claims, which

will now be discussed.

Referring now to Applicant's independent claims, claim 1 (as amended herein)

states:

> 1. (Currently Amended) An apparatus, comprising:
> a multiple-image viewer to concurrently display multiple images
> within a single window in a network system, **the viewer enabling**
> **manipulation by a user of each of the images independently of each**
> **other**, at least one of the images displayed being a raster graphics file,
> each of the displayed images having a separate data file. (Emphasis
> added.)

Cronin discloses displaying an image and eliminating performance problems for

large images by separating an image into tiles. (Cronin, Abstract). In contrast with

claim 1, however, Cronin does not disclose or suggest the ability of a <u>user to manipulate</u>

multiple concurrently displayed images <u>independently of each other</u>. Cronin does

disclose the following example (col. 4, lines 44-57):

> For example, consider a view of 512 pixels by 512 pixels. Without
> tiling, this view is composed of a single GIF file that is displayed by the
> Web browser, and so if the user asks for the view to be shifted by 256
> pixels, then a new GIF image of 512x512 pixels needs to be created and
> transmitted to the Web browser. With tiling, the first view would cause 16
> view tiles to be computed and transmitted for display by the Web browser.
> **When the request for the view to be shifted by 256 pixels is made,**
> **only 8 view tiles representing an area of 256 by 512 pixels need to be**
> **computed. In addition only the 8 new view tiles need to be**
> **transmitted to the Web browser since the shifted view will reuse 8**
> **view tiles that are available from the Web browser cache.** Col. 4, lines
> 44-57 (emphasis added).

Thus, Cronin discloses that tiles are computed (or pre-computed) by a server and then transmitted to and displayed by a browser. If the user requests a change to the current view, such as a shift in a particular direction, then a new set of tiles may be determined, and any new tiles which the browser does not yet have are transmitted to the browser. The browser then displays the new/revised set of tiles.

There is no ability disclosed or suggested in Cronin, however, for concurrently displayed tiles (or other images) to be manipulated by a user independently of each other. Nor is there any indication in Cronin of why it might be desirable to have such capability.

Therefore, claim 1 is not anticipated or rendered obvious by Cronin. Claim 1 and all claims which depend on it are patentable over the cited art.

Independent claims 33, 38 and 44 each include similar limitations to those in claim 1 discussed above and are therefore patentable along with their dependent claims for similar reasons to those discussed above.

Dependent Claims

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.
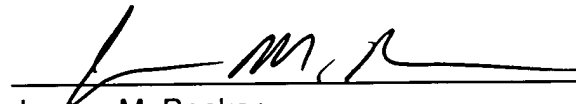
Conclusion

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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